



# City of Chattanooga

Mayor Andy Berke

January 31, 2020

VIA CERTIFIED MAIL

Ms. Sara Janovitz  
Environmental Engineer  
Clean Water Enforcement Branch  
US EPA-Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303

**Re: *United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245*  
Quarterly Report No. 26 – October 2019 to December 2019**

Dear Ms. Janovitz:

On behalf of the City of Chattanooga, Tennessee ("City"), and in accordance with the consent decree entered by the United States District Court for the Eastern District of Tennessee (Southern Division), on April 24, 2013, in the case styled the United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245 ("Consent Decree"), we are submitting to both the Environmental Protection Agency ("EPA") and the Tennessee Department of Environment and Conservation ("TDEC") the twenty-sixth quarterly report required pursuant to paragraph 38 of the Consent Decree. This report is also being submitted in accordance with the letter from Denise Diaz, dated September 16, 2013, establishing the dates for reporting under the Consent Decree.

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Ms. Sara Janovitz  
January 31, 2020  
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Please let me know if you have any questions regarding our submittal.

Sincerely,



Jeffrey A. Rose, P.E.  
Director, Waste Resources Division

Enclosure

cc: Karl Fingerhood, Esq., US DOJ  
Chief, Environmental Enforcement Section, US DOJ  
Chief, Clean Water Enforcement Branch, US EPA Region 4  
Bill Bush, Esq., US EPA  
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Mike Marino, P.E., Jacobs Engineering



# **Quarterly Report No. 26**

**October 1, 2019 – December 31, 2019**

*Prepared for*

**United States Environmental Protection Agency  
and Tennessee Department of Environment and  
Conservation**

City of Chattanooga  
Waste Resources Division  
Consent Decree Program  
Case No. 1:12-cv-00245

*Prepared by*

**City of Chattanooga**  
Waste Resources Division

*Submitted by*

**Jacobs**

Jacobs Engineering Group Inc.  
Consent Decree Program Manager

Chattanooga, Tennessee

January 31, 2020



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# Acronyms and Abbreviations

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Ave	Avenue
CD	Consent Decree
CFR	Code of Federal Regulations
CSO	Combined Sewer Overflow
CSS	Combined Sewer System
Dr	Drive
EPA	Environmental Protection Agency
Gal	Gallons
Hrs	Hours
Hwy	Highway
Ln	Lane
MBWWTP	Moccasin Bend Waste Water Treatment Plant
MG	Million Gallons
MH	Manhole
N/A	Not Applicable
No.	Number
NPDES	National Pollutant Discharge Elimination System
PS	Pump Station
Rd	Road
SSO	Sanitary Sewer Overflow
St	Street
TDEC	Tennessee Department of Environment and Conservation
Trl	Trail
UNK	Unknown
WCTS	Wastewater Collection and Transmission System
WWTP	Wastewater Treatment Plant

# 1.0 Introduction

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## 1.1 Purpose

The City of Chattanooga entered into a consent decree with the United States and the State of Tennessee in the case styled *United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245* (“CD”), which became effective on April 24, 2013. Pursuant to Section IX, paragraph 38 of the CD, Chattanooga is required to submit reports on a quarterly basis to the Environmental Protection Agency (“EPA”) and Tennessee Department of Environment and Conservation (“TDEC”). Chattanooga has prepared Quarterly Report No.26 to satisfy the reporting requirements of the CD. This report is also being submitted in accordance with the letter from Denise Diaz, dated September 16, 2013, establishing the dates for reporting under the CD.

## 1.2 Requirements

As detailed in Section IX, paragraph 38 of the CD, Chattanooga is required to report the date, time, location, source, estimated duration and volume, and receiving water of the following events:

1. Sanitary sewer overflow (“SSO”) events occurring during the reporting period;
2. Combined sewer overflow (“CSO”) outfall discharges occurring during the reporting period; and
3. Bypasses at the Moccasin Bend Wastewater Treatment Plant (“MBWWTP”) occurring during the reporting period.

This information is provided in tabular form in Sections 2.0 – 4.0 of this report.





## 2.0 SSO Events

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For the reporting period of October 1, 2019 through December 31, 2019, Chattanooga experienced the SSOs listed in Table 2-1. An SSO event is defined in paragraph 8.(nn) of the CD as “any discharge of wastewater to waters of the United States or State from Chattanooga’s Sewer System through a point source not permitted in any National Pollutant Discharge Elimination System (“NPDES”) permit, as well as any overflow, spill, or release of wastewater to public or private property from the Sewer System that may not have reached waters of the United States or the State, including all building backups.”



**Table 2-1**  
**Quarterly SSO Report**

SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
1	02-Oct-19	10:00 AM	7609 Standifer Gap Rd	Manhole	S139N008	7.25	10,500	Storm Ditch	Blockage - Trash/Debris
2	15-Oct-19	10:30 AM	1044 Dardmouth St.	Manhole	S127P070	0.25	375	Storm Ditch	Blockage - Trash/Debris
3	26-Oct-19	12:05 PM	2843 Waterhaven Dr	Manhole	S128G064	44.75	39,600	South Chickamauga Creek	Wet Weather
4	28-Oct-19	11:00 AM	455 W 42nd St	Manhole	S167C047	6.00	3,600	Storm Ditch	Blockage - Trash/Debris
5	30-Oct-19	1:45 PM	914 Sterling Ave	Manhole	S136H107	44.08	79,350	Tennessee River	Wet Weather
6	31-Oct-19	10:08 AM	1020 Lupton Dr	Manhole	S118K006	23.87	71,600	Tennessee River	Wet Weather
7	31-Oct-19	10:30 AM	122 Rowland Gap Rd (West Bank)	Manhole	S135O217	10.83	2,273,000	Tennessee River	Wet Weather
8	03-Nov-19	10:00 AM	4500 Wilson St	Manhole	S129I104	4.00	720	Storm Drain	Blockage - Trash/Debris
9	03-Nov-19	11:00 AM	6557 Fair Harbor Trl	Manhole	S111B011	UNK <sup>2</sup>	25,000	Storm Drain	Wet Weather
10	03-Nov-19	2:30 PM	421 Valleybrook Rd	Manhole	S092P004	3.17	950	Storm Drain	Blockage - Trash/Debris
11	11-Nov-19	9:10 AM	5510 Moody Sawyer RD	Manhole	S099E062	27.33	16,410	Storm Ditch	Blockage - Roots
12	12-Nov-19	9:30 AM	1441 Crawford St	Other	UNK <sup>2</sup>	1.75	1,575	Storm Ditch	Blockage - Grease
13	14-Nov-19	11:20 AM	1001 Airport Rd	Manhole	S147D004	UNK <sup>2</sup>	25	Land*	Wet Weather
14	19-Nov-19	3:35 PM	2026 E. Polymer Dr	Manhole	S148B042	7.92	2,646	Storm Ditch	Blockage - Gravel
15	21-Nov-19	8:30 AM	2026 E. Polymer Dr	Manhole	S148B042	1.50	40	Storm Ditch	Blockage - Gravel
16	21-Nov-19	12:00 PM	3224 Navajo Dr	Main Line	UNK <sup>2</sup>	4.00	6,000	Storm Ditch	Blockage - Roots
17	27-Nov-19	9:15 AM	1020 Lupton Dr	Manhole	S118K006	22.25	66,750	Tennessee River	Wet Weather
18	27-Nov-19	10:00 AM	914 Sterling Ave	Manhole	S136H107	UNK <sup>2</sup>	30	Tennessee River	Wet Weather
19	30-Nov-19	7:40 PM	122 Rowland Gap Rd (West Bank)	Manhole	S135O217	2.10	553,326	Tennessee River	Wet Weather
20	01-Dec-19	1:25 AM	122 Rowland Gap Rd (West Bank)	Manhole	S135O217	11.75	3,276,802	Tennessee River	Wet Weather

**Table 2-1**  
**Quarterly SSO Report**

SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
21	01-Dec-19	4:30 AM	1610 Elm St (DuPont PS)	Manhole	S118E055	15.50	6,750	Tennessee River	Wet Weather
22	01-Dec-19	3:30 PM	2914 Hamill Rd	Manhole	S110F014	18.50	111,000	North Chickamauga Creek	Wet Weather
23	02-Dec-19	11:00 AM	1020 Lupton Dr	Manhole	S118K006	23.00	276,000	Tennessee River	Wet Weather
24	02-Dec-19	1:00 PM	3857 Birmingham Dr	Manhole	S118D128	UNK <sup>2</sup>	150	Tennessee River	Wet Weather
25	02-Dec-19	1:05 PM	1720 Strawberry Ln	Manhole	S110I450	0.83	150	Storm Drain	Wet Weather
26	03-Dec-19	10:00 AM	5010 Creekside Preserve	Service Line	UNK <sup>2</sup>	UNK <sup>2</sup>	100	North Chickamauga Creek	Wet Weather
27	03-Dec-19	12:30 PM	4712 Deanna Ln	Main Line	UNK <sup>2</sup>	0.50	20	Land*	Break
28	04-Dec-19	1:20 PM	3055 Hickory Valley Rd	Service Line	UNK <sup>2</sup>	0.92	550	Storm Ditch	Blockage - Grease
29	05-Dec-19	2:30 PM	5510 Moody Sawyer RD	Manhole	S099E062	3.68	663	Storm Ditch	Blockage - General
30	06-Dec-19	2:00 PM	1300 Gadd Rd	Service Line	UNK <sup>2</sup>	2.00	25	Structure*	Blockage - Trash/Debris
31	06-Dec-19	2:00 PM	5336 Austin Dr	Service Line	UNK <sup>2</sup>	2.00	100	Structure*	Blockage - Trash/Debris
32	09-Dec-19	9:30 AM	3107 E 43rd St	Manhole	S168J048	1.50	270	Storm Drain	Blockage - Grease
33	22-Dec-19	9:50 PM	122 Rowland Gap Rd (West Bank)	Manhole	S135O217	43.08	14,145,927	Tennessee River	Wet Weather
34	23-Dec-19	12:30 AM	1404 August Dr	Manhole	S110H001	13.50	2,250	Storm Drain	Blockage - Trash/Debris
35 <sup>1</sup>	23-Dec-19	4:30 AM	5302 Old Mission Rd	Manhole	S157K058	8.50	3,030	Storm Drain	Wet Weather
36	23-Dec-19	5:00 AM	2013 S Kelley St	Manhole	S156G022	8.00	960	Dobbs Branch	Wet Weather
37 <sup>1</sup>	23-Dec-19	8:30 AM	621 Lupton Dr	Manhole	S118G077	21.00	20,160	Storm Drain	Wet Weather
38	23-Dec-19	9:00 AM	0 Aim Way	Manhole	S157H046	4.50	4,050	Storm Drain	Wet Weather
39	23-Dec-19	9:30 AM	Wilcox Blvd and Shallowford Rd	Manhole	S147F015	20.67	12,400	South Chickamauga Creek	Wet Weather
40	23-Dec-19	9:30 AM	3728 Wilcox Blvd	Manhole	S147B301	4.50	810	Storm Drain	Wet Weather

**Table 2-1**  
**Quarterly SSO Report**

SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
41	23-Dec-19	10:00 AM	1022 Shallowford Rd	Manhole	S147G104	4.00	2,400	South Chickamauga Creek	Wet Weather
42 <sup>1</sup>	23-Dec-19	10:00 AM	2914 Hamill Rd	Manhole	S110F014	19.75	58,406	North Chickamauga Creek	Wet Weather
43 <sup>1</sup>	23-Dec-19	10:30 AM	6722 Hickory Creek Rd	Manhole	S138M019	19.83	3,540	Storm Drain	Wet Weather
44	23-Dec-19	10:30 AM	1020 Lupton Dr	Manhole	S118K006	52.50	78,750	Tennessee River	Wet Weather
45	23-Dec-19	10:45 AM	914 Sterling Ave	Manhole	S136H107	18.50	83,250	Tennessee River	Wet Weather
46	23-Dec-19	1:00 PM	3857 Birmingham Dr	Manhole	S118D128	16.50	9,900	Tennessee River	Wet Weather
47	23-Dec-19	1:50 PM	End of MLK BLVD (East Bank)	East Bank	S135O547	3.33	758,753	Tennessee River	Wet Weather
48	23-Dec-19	2:45 PM	600 River St	Manhole	S135L005	17.00	5,100	Tennessee River	Wet Weather

<sup>1</sup> Common cause, within 500 yards of separate event.

<sup>2</sup> This information was not available at time of reporting.

\* Did not reach waters of the United States

## 3.0 Moccasin Bend WWTP Bypasses

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The CD sets forth the same definition for bypass as the EPA's regulations at 40 C.F.R. § 122.41(m), which defines a bypass as the intentional diversion of waste streams from any portion of a treatment facility. The City's current NPDES permit defines a bypass as the intentional diversion of wastewater away from any portion of a treatment facility other than through peak excess flow treatment facilities or permitted outfalls in accordance with both the long-term control plan and the nine minimum technology-based effluent controls for combined sewer systems. The City reports bypasses and wet weather discharges separately on the monthly Discharge Monitoring Reports, as a discharge from the City's permitted wet weather discharge is not a bypass under the City's current NPDES permit. Based on the foregoing, the WWTP experienced no bypasses during the reporting period of October 1, 2019 through December 31, 2019.



## 4.0 CSO Outfall Discharges

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For the reporting period of October 1, 2019 through December 31, 2019, Chattanooga experienced CSO discharges from CSO outfall treatment facilities as listed in Table 4-1. Paragraph 8.(h) of the CD defines a CSO as “any discharge from the CSS from any outfall currently identified, or identified in the future, as a permitted combined sewer overflow outfall in any Chattanooga NPDES permit from which CSOs are discharged to waters of the United States or the State.” The CSS is defined as the portion of Chattanooga’s wastewater collection and transmission system (“WCTS”) designed to convey municipal sewage (domestic, commercial and industrial wastewaters) and storm water runoff through a single-pipe system to Chattanooga’s WWTP or CSO outfalls. Chattanooga operates eight (8) permitted CSO outfall treatment facilities, eight (8) of which discharged during the reporting period.





**Table 4-1**  
**Quarterly CSO Outfall Discharge Report**

October 1, 2019 – December 31, 2019						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
22-Oct-19	1:12 AM	Tremont CSO (005)	1.5	0.770915	Tennessee River	Rain Event
22-Oct-19	2:30 AM	19th St CSO (008)	2.6	0.713545	Tennessee River	Rain Event
22-Oct-19	2:41 AM	Ross's Landing CSO (006)	1.37	3.126260	Tennessee River	Rain Event
22-Oct-19	2:41 AM	ML King CSO (007)	4.58	0.739693	Tennessee River	Rain Event
22-Oct-19	2:43 AM	Citico CSO (004)	1.95	2.168120	Tennessee River	Rain Event
22-Oct-19	4:33 AM	Central Ave CSO (002)	18.73	5.082182	Tennessee River	Rain Event
25-Oct-19	2:51 PM	Carter St CSO (009)	11.54	6.034538	Tennessee River	Rain Event
25-Oct-19	3:29 PM	19th St CSO (008)	5.7	0.551573	Tennessee River	Rain Event
25-Oct-19	3:42 PM	Citico CSO (004)	16.33	9.093101	Tennessee River	Rain Event
25-Oct-19	4:02 PM	Tremont CSO (005)	4.58	0.467556	Tennessee River	Rain Event
25-Oct-19	6:05 PM	ML King CSO (007)	15.42	1.169411	Tennessee River	Rain Event
25-Oct-19	6:10 PM	Central Ave CSO (002)	45.24	15.757720	Tennessee River	Rain Event
25-Oct-19	7:54 PM	Ross's Landing CSO (006)	4.03	3.107578	Tennessee River	Rain Event
26-Oct-19	12:43 AM	Williams St CSO (003)	11.8	0.446357	Tennessee River	Rain Event
26-Oct-19	8:17 PM	19th St CSO (008)	0.23	0.004583	Tennessee River	Rain Event
30-Oct-19	12:40 PM	Tremont CSO (005)	12.09	1.454738	Tennessee River	Rain Event
30-Oct-19	12:51 PM	Carter St CSO (009)	16.72	11.725790	Tennessee River	Rain Event
30-Oct-19	12:52 PM	ML King CSO (007)	32.15	2.964176	Tennessee River	Rain Event
30-Oct-19	12:59 PM	Ross's Landing CSO (006)	2.03	1.763744	Tennessee River	Rain Event
30-Oct-19	12:59 PM	19th St CSO (008)	3.95	0.496881	Tennessee River	Rain Event
30-Oct-19	1:02 PM	Citico CSO (004)	27.3	11.115880	Tennessee River	Rain Event
30-Oct-19	3:01 PM	Central Ave CSO (002)	32.97	19.637621	Tennessee River	Rain Event
31-Oct-19	4:01 AM	Williams St CSO (003)	18.02	1.440423	Tennessee River	Rain Event
01-Nov-19	12:00 AM	Central Ave CSO (002)	10.53	0.282248	Tennessee River	Rain Event
23-Nov-19	6:19 AM	Tremont CSO (005)	5.65	0.825738	Tennessee River	Rain Event

**Table 4-1**  
**Quarterly CSO Outfall Discharge Report**

October 1, 2019 – December 31, 2019						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
23-Nov-19	6:36 AM	Citico CSO (004)	5.63	6.410360	Tennessee River	Rain Event
23-Nov-19	6:44 AM	Carter St CSO (009)	6.15	3.329298	Tennessee River	Rain Event
23-Nov-19	6:50 AM	ML King CSO (007)	12.85	1.595164	Tennessee River	Rain Event
23-Nov-19	7:08 AM	19th St CSO (008)	4.7	0.730432	Tennessee River	Rain Event
23-Nov-19	9:07 AM	Central Ave CSO (002)	31.28	8.517613	Tennessee River	Rain Event
23-Nov-19	9:14 AM	Ross's Landing CSO (006)	3.63	2.354216	Tennessee River	Rain Event
27-Nov-19	5:35 AM	Tremont CSO (005)	2.27	0.843047	Tennessee River	Rain Event
27-Nov-19	5:42 AM	Carter St CSO (009)	3.23	1.330474	Tennessee River	Rain Event
27-Nov-19	5:55 AM	ML King CSO (007)	5.5	0.696867	Tennessee River	Rain Event
27-Nov-19	6:12 AM	Ross's Landing CSO (006)	0.87	0.940604	Tennessee River	Rain Event
27-Nov-19	6:29 AM	19th St CSO (008)	1	0.062265	Tennessee River	Rain Event
27-Nov-19	6:42 AM	Citico CSO (004)	40.65	13.648716	Tennessee River	Rain Event
27-Nov-19	8:10 AM	Central Ave CSO (002)	14.27	0.720508	Tennessee River	Rain Event
30-Nov-19	6:46 PM	Tremont CSO (005)	4.32	1.466441	Tennessee River	Rain Event
30-Nov-19	7:51 PM	ML King CSO (007)	4.15	2.002852	Tennessee River	Rain Event
30-Nov-19	8:19 PM	19th St CSO (008)	3.67	1.319603	Tennessee River	Rain Event
30-Nov-19	9:12 PM	Ross's Landing CSO (006)	2.8	4.684060	Tennessee River	Rain Event
30-Nov-19	9:26 PM	Carter St CSO (009)	2.57	2.778577	Tennessee River	Rain Event
30-Nov-19	9:28 PM	Central Ave CSO (002)	2.53	5.959067	Tennessee River	Rain Event
30-Nov-19	9:42 PM	Citico CSO (004)	2.32	3.760984	Tennessee River	Rain Event
01-Dec-19	12:00 AM	Tremont CSO (005)	7.68	1.000587	Tennessee River	Rain Event
01-Dec-19	12:00 AM	Ross's Landing CSO (006)	3.73	1.187556	Tennessee River	Rain Event
01-Dec-19	12:00 AM	ML King CSO (007)	18.17	0.854194	Tennessee River	Rain Event
01-Dec-19	12:00 AM	19th St CSO (008)	2.48	0.154913	Tennessee River	Rain Event
01-Dec-19	12:00 AM	Carter St CSO (009)	5.02	1.789719	Tennessee River	Rain Event

**Table 4-1**  
**Quarterly CSO Outfall Discharge Report**

October 1, 2019 – December 31, 2019						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
01-Dec-19	12:00 AM	Central Ave CSO (002)	37.4	9.014454	Tennessee River	Rain Event
01-Dec-19	12:00 AM	Citico CSO (004)	18	9.224426	Tennessee River	Rain Event
17-Dec-19	12:47 AM	Tremont CSO (005)	0.35	0.015753	Tennessee River	Rain Event
17-Dec-19	1:09 AM	19th St CSO (008)	0.37	0.006724	Tennessee River	Rain Event
17-Dec-19	3:17 AM	Carter St CSO (009)	0.67	0.118291	Tennessee River	Rain Event
17-Dec-19	3:30 AM	Citico CSO (004)	32.17	0.677442	Tennessee River	Rain Event
17-Dec-19	3:46 AM	ML King CSO (007)	4.38	0.053014	Tennessee River	Rain Event
17-Dec-19	4:29 AM	Central Ave CSO (002)	13.15	0.773110	Tennessee River	Rain Event
22-Dec-19	7:58 PM	19th St CSO (008)	6.87	0.762762	Tennessee River	Rain Event
22-Dec-19	8:00 PM	Citico CSO (004)	108.63	24.544518	Tennessee River	Rain Event
22-Dec-19	8:49 PM	Central Ave CSO (002)	18.36	16.301698	Tennessee River	Rain Event
22-Dec-19	9:05 PM	Carter St CSO (009)	9.22	4.567282	Tennessee River	Rain Event
22-Dec-19	10:28 PM	Tremont CSO (005)	6.8	0.790838	Tennessee River	Rain Event
22-Dec-19	11:42 PM	Ross's Landing CSO (006)	5.9	2.583438	Tennessee River	Rain Event